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Case 1:18-cr-00693-RMB Document 120 Filed 08/30/19 Page 1 of 2 U.S. Department of Justice

United States Attorney Southern District of New York

USDC SDNY

DOCUMENT

DATE FILED:

ELECTRONICALLY FILED

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

MEMO ENDORSED

August 30, 2019

P. 2

BY ECF

The Honorable Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

United States v. Ramses Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

Re:

The Government respectfully submits this letter, with the consent of counsel for Ramses Owens, to respectfully request an extension to file its reply in support of the Government's Motion for Application of the Crime-Fraud Exception and Waiver of the Attorney-Client Privilege (Dkt. No. 110) (Aug. 14, 2019). On August 28, 2019, defendant Ramses Owens filed an opposition to the Government's motion. (Dkt. No. 118). No other party has filed an opposition to the Government's motion. The Government requests an extension until September 10, 2019 to respond.

The Government requests this brief extension to file its opposition because multiple members of the prosecution team are traveling this week. The Government has conferred with counsel for Ramses Owens, who consents to this request.

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A proposed endorsement for the Court's consideration is below.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/ Thank Rehn

Eun Young Choi Thane Rehn Assistant United States Attorneys (212) 637-2187/2354

cc: Defense Counsel (by ECF)

ENDORSEMENT:

On consent of the Defendants, the Government's request for an extension to extension to file its reply in support of the Government's Motion for Application of the Crime-Fraud Exception and Waiver of the Attorney-Client Privilege (Dkt. No. 110) to September 10, 2019 is hereby GRANTED.

SO ORDERED.

Date:

New York, New York

Richard M. Borner

HONORABLE RICHARD M. BERMAN UNITED STATES DISTRICT JUDGE